

STATE OF MICHIGAN 36 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT:
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District Court ORI: MI820365J

421 MADISON DETROIT, MI 48226 313-965-2400

Circuit Court ORI: MI821095J

1441 St. Antoine, Detroit, Michigan 48226 313-224-2520

AG ORI:

MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN

v

ERIC F. MILLER 96-13901130-01
JOHN A. JONES 96-13901130-02
ROBERT W. WATSON 96-13901130-03
PHILLIP A. LOCKHART 96-13901130-04
KENNETH RUSS 96-13901130-05
MORENO TAYLOR 96-13901130-06
DELOS R. MATTHEWS 96-13901130-07

DOB:
10/26/1964
8/28/1959
9/5/1961
9/3/1956
10/30/1961
10/28/1960
12/22/1959

Victim or complainant: FBI S/A BYRON FOX & FBI S/A MIKE FITZGERALD	Complaining Witness PEOPLE OF THE STATE OF MICHIGAN	Date: On or about 01/01/2008-08/29/2013
City/Twp./Village DETROIT	County in Michigan Wayne	
Charge(s) See Below		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE

The complaining witness says that on the above date and in the City of Detroit, the Defendant(s), contrary to law,

COUNT 1 DEFENDANT(S) (01): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a gift or gratuity from Confidential Human Source 1 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]
FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

COUNT 2 DEFENDANT(S) (01): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with Confidential Human Source 1 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]
MISDEMEANOR: 1 Year and/or \$1,000.00

COUNT 3 DEFENDANT(S) (02): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a gift or gratuity from Confidential Human Source 2 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]
FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

COUNT 4 DEFENDANT(S) (02): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with Confidential Human Source 2 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]
MISDEMEANOR: 1 Year and/or \$1,000.00

COUNT 5 DEFENDANT(S) (02): COMMON LAW OFFENSES

did commit an indictable offense at common law, to wit: Misconduct in Office; contrary to MCL 750.505. [750.505-C]
FELONY: 5 Years and/or \$10,000.00

COUNT 6 DEFENDANT(S) (03): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a gift or gratuity from Alvin Alosachi via Confidential Human Source 3 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]

FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

COUNT 7 DEFENDANT(S) (03): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a gift or gratuity from James Pellerito via Confidential Human Source 3 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]

FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

COUNT 8 DEFENDANT(S) (03): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with Alvin Alosachi and/or Confidential Human Source 3 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]

MISDEMEANOR: 1 Year and/or \$1,000.00

COUNT 9 DEFENDANT(S) (03): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with James Pellerito and/or Confidential Human Source 3 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]

MISDEMEANOR: 1 Year and/or \$1,000.00

COUNT 10 DEFENDANT(S) (04): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a promise of a gift or gratuity from Burton Katz via Confidential Human Source 4 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]

FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

COUNT 11 DEFENDANT(S) (04): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with Burton Katz and/or Confidential Human Source 4 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]

MISDEMEANOR: 1 Year and/or \$1,000.00

COUNT 12 DEFENDANT(S) (05): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a gift or gratuity from Confidential Human Source 4 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]

FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

COUNT 13 DEFENDANT(S) (05): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with Confidential Human Source 4 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]

MISDEMEANOR: 1 Year and/or \$1,000.00

COUNT 14 DEFENDANT(S) (06): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a gift or gratuity from Confidential Human Source 4 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]

FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

COUNT 15 DEFENDANT(S) (06): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with Confidential Human Source 4 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]

MISDEMEANOR: 1 Year and/or \$1,000.00

COUNT 16 DEFENDANT(S) (07): PUBLIC OFFICER - ACCEPTING BRIBE

did accept a gift or gratuity from Confidential Human Source 4 under an agreement or understanding that his opinion or judgment will be given in a particular manner; contrary to MCL 750.118. [750.118]

FELONY: 10 Years or \$5,000.00 plus disqualification from public office for life

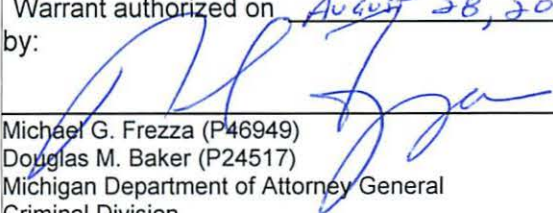
COUNT 17 DEFENDANT(S) (07): BRIBERY - AGENT/EMPLOYEE

did, as an agent or employee of the City of Detroit, request or accept a commission, gift, or gratuity, or a promise of a commission, gift, or gratuity for himself, according to an agreement or understanding with Confidential Human Source 4 that he would act in a particular manner in relation to his principal's or employer's business; contrary to MCL 750.125. [750.125]

MISDEMEANOR: 1 Year and/or \$1,000.00

Upon conviction of a felony or an attempted felony court shall order law enforcement to collect DNA identification profiling samples.

The complaining witness asks that defendant(s) be apprehended and dealt with according to law.

Warrant authorized on <u>August 28, 2013</u>	Complaining witness signature _____
by: 	Date _____
Michael G. Frezza (P46949) Douglas M. Baker (P24517) Michigan Department of Attorney General Criminal Division Cadillac Place Building, Suite 10-200 3030 W. Grand Blvd. Detroit, MI 48202 313-456-0180	Subscribed and sworn to before me on _____ Date _____
	Judge/Magistrate/Clerk _____ Bar no. _____